

EXHIBIT

C

JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989
GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL, P.C.
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344-7131/(609) 347-2052 fax
Attorneys for Plaintiffs

DYNAMIC DUO 8, LLC d/b/a ANTHEM LOUNGE & MAUREACE SNAPP,)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION
)	ATLANTIC COUNTY
Plaintiffs,)	
)	DOCKET NO.: ATL-L-
v.)	
)	Civil Action
KINSALE INSURANCE COMPANY,)	
GARRETT GRIFFIN, TROPICANA)	
ATLANTIC CITY CORP. d/b/a)	COMPLAINT FOR DECLARATORY
TROPICANA CASINO & RESORT,)	JUDGMENT
JESUS PRADO, DAVID TSAPIS, JOHN)	
DOES I-V, ABC BUSINESS ENTITIES I-)	
V & XYZ CORPORATIONS I-V,)	
)	
Defendants.)	
)	

Plaintiffs Dynamic Duo 8, LLC d/b/a Anthem Lounge and Maureace Snapp, located at 2801 Pacific Avenue, City of Atlantic City, County of Atlantic and State of New Jersey, by way of Complaint for Declaratory Judgment says:

FIRST COUNT

1. Defendant Kinsale Insurance Company ("Kinsale") issued a commercial general liability policy to Plaintiff Dynamic Duo 8, LLC d/b/a Anthem Lounge ("Anthem") under policy number 0100015671-0 which policy was in full force and effect on April 26, 2014.
2. Plaintiff Maureace Snapp ("Plaintiff Snapp") was an employee of Anthem on April 26, 2014.
3. Defendant Garrett Griffin ("Griffin") has instituted suit against Plaintiffs Anthem and Snapp along with Defendants Tropicana Atlantic City Corp. d/b/a Tropicana Casino & Resort

(“Tropicana”), Jesus Prado and David Tsapis for injuries allegedly sustained as a result of an alleged assault on April 26, 2014 at Tropicana Hotel and Casino located in Atlantic City, New Jersey.

4. Griffin filed a Second Amended Complaint against Plaintiffs alleging four causes of action: negligence, negligence in failing to rescue, breach of promise to provide a safe and secure premises for guests, and punitive damages. Griffin alleges that Plaintiff Snapp was present at the time of his assault as he was performing a courtesy escort of Anthem patrons.

5. The policy of insurance issued by Kinsale provides that its insurance applies to bodily injury arising out of the ownership, maintenance or use of the premises of Anthem Lounge.

6. Kinsale has denied coverage as the alleged assault did not occur inside of the Anthem Lounge.

7. Contrary to Kinsale’s position, as a result of the claims asserted by Griffin, the claims are covered under the policy of insurance issued by Kinsale.

8. Defendants Griffin, Tropicana, Jesus Prado and David Tsapis have been named as parties in this declaratory judgment action because they may have an interest in the determination of the existence or absence of insurance for Plaintiffs under the Kinsale policy.

WHEREFORE Plaintiffs Dynamic Duo 8, LLC d/b/a Anthem Lounge and Maureace Snapp demand judgment as follows:

1. Directing that Kinsale does owe liability coverage including indemnifying and providing counsel to Dynamic Duo 8, LLC d/b/a Anthem Lounge and its employee, Maureace Snapp for all claims being asserted by Defendant Garrett Griffin, and any cross-claims and counterclaims being asserted by Defendants Tropicana Atlantic City Corp. d/b/a Tropicana Casino & Resort, Jesus Prado and David Tsapis;
2. Directing that Kinsale reimburse Dynamic Duo 8, LLC d/b/a Anthem Lounge and Maureace Snapp for attorney fees and costs incurred in defending the underlying lawsuit of Griffin v. Tropicana et al;

3. For all other relief that this Court deems just and equitable.

JURY DEMAND

Plaintiffs Dynamic Duo 8, LLC d/b/a Anthem Lounge and Maureace Snapp hereby demands trial by a jury on all issues herein.

NOTICE OF TRIAL COUNSEL

PLEASE TAKE NOTICE that Joel M. Chipkin, Esquire is hereby designated as trial counsel in the above-captioned litigation for the firm of Goldenberg Mackler Sayegh Mintz Pfeffer Bonchi & Gill pursuant to Rule 4:25-4.

CERTIFICATION UNDER RULE 4:5-1

I, Joel M. Chipkin, hereby certify, pursuant to New Jersey Court Rule 4:5-1, that to the best of my knowledge, the claims raised herein are the subject of another action pending in the Superior Court of New Jersey, Law Division, Camden County known as Garrett Griffin v. Tropicana et al, docket number CAM-L-1594-16.

I certify that the foregoing statements made by me are true to my personal knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment for perjury.

**GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL**
Attorneys for Plaintiffs

By: _____

Joel M. Chipkin, Esquire

Dated: August 21, 2018

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-002062-18

Case Caption: DYNAMIC DUO 8 LLC D/ B/A ANTHE VS KINSALE INSURA

Case Initiation Date: 08/21/2018

Attorney Name: JOEL MARK CHIPKIN

Firm Name: GOLDENBERG MACKLER SAYEGH ET AL

Address: 1030 ATLANTIC AVE

ATLANTIC CITY NJ 08401

Phone:

Name of Party: PLAINTIFF : Dynamic Duo 8 LLC d/b/a

Anthem

Name of Defendant's Primary Insurance Company

(if known): None

Case Type: OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: YES

If yes, list docket numbers: CAM-I-1594-16

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

08/21/2018

Dated

/s/ JOEL MARK CHIPKIN

Signed

ATLANTIC COUNTY COURT HOUSE
SUPERIOR COURT LAW DIV
1201 BACHARACH BLVD
ATLANTIC CITY NJ 08401

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 345-6700
COURT HOURS 8:30 AM - 4:30 PM

DATE: AUGUST 21, 2018
RE: DYNAMIC DUO 8 LLC D/ B/A ANTHE VS KINSALE INSURA
DOCKET: ATL L -002062 18

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 1.

DISCOVERY IS 150 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON MARY C. SIRACUSA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (609) 594-3363.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JOEL M. CHIPKIN
GOLDENBERG MACKLER SAYEGH ET A

1030 ATLANTIC AVE
ATLANTIC CITY NJ 08401

ECOURTS

Russell L. Lichtenstein, Esquire (ID#:022751981)
COOPER LEVENSON, P.A.
1125 Atlantic Avenue - Third Floor
Atlantic City, NJ 08401
(609) 344-3161
File No. 55654.00156
Attorney For Defendant, Tropicana Atlantic City Corp. d/b/a Tropicana Casino and Resort

DYNAMIC DUO 8, LLC d/b/a ANTHEM LOUNGE
& MAUREACE SNAPP,

Plaintiffs,

vs.

KINSALE INSURANCE COMPANY, GARRETT
GRIFFIN, TROPICANA ATLANTIC CITY CORP
d/b/a TROPICANA CASINO & RESORT, JESUS
PRADO, DAVID TSAPIS, JOHN DOES I-V, ABC
BUSINESS ENTITIES I-V & XYZ
CORPORATIONS I-V,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
ATLANTIC COUNTY

DOCKET NO. ATL-L-2062-18

Civil Action

**ANSWER TO PLAINTIFF'S
COMPLAINT**

Defendant, Tropicana Atlantic City Corp. d/b/a Tropicana Casino and Resort, by way of

Answer to Plaintiff's Complaint for Declaratory Judgment hereby says as follows:

FIRST COUNT

1. This answering party is without information sufficient to form a belief as to the truthfulness of this allegation of Plaintiffs' Complaint and leaves Plaintiffs to their proofs.
2. Admitted.
3. Admitted.
4. Admitted.
5. This answering party neither admits nor denies the allegations of this paragraph of Plaintiffs' Complaint and leaves Plaintiffs to their proofs.
6. This answering party neither admits nor denies the allegations of this paragraph of Plaintiffs' Complaint and leaves Plaintiffs to their proofs.

7. This answering party neither admits nor denies the allegations of this paragraph of Plaintiffs' Complaint and leaves Plaintiffs to their proofs.

8. No response to this paragraph is necessary.

NOTICE PURSUANT TO RULES 1:5-1(A) AND 4:17-4(C)

TAKE NOTICE that the undersigned attorneys, counsel for the answering defendant, does hereby demand, pursuant to Rules 1:5-1(a) and 4:17-4(c) that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other materials referred to therein, upon the undersigned attorneys, and TAKE NOTICE that this is a continuing demand.

JURY DEMAND

Trial by jury is hereby demanded as to all issues set forth herein.

CERTIFICATION

It is hereby certified that a copy of the within pleading was served upon, Joel M. Chipkin, Esquire, attorney for plaintiff, by eCourts electronic filing, within the time prescribed by Rule 4:6.

CERTIFICATION PURSUANT TO RULE 4:5-1

The undersigned, Russell L. Lichtenstein, Esquire, certifies on behalf of the above-named Defendant as follows:

1. I am an attorney admitted to practice law in the State of New Jersey, with the firm of Cooper Levenson, counsel for the above-named Defendant.

2. The matter in controversy in this matter is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

3. At this time, there are no other parties who should be joined in this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

NOTICE OF TRIAL COUNSEL

PLEASE BE NOTIFIED that pursuant to Rule 4:25, Russell L. Lichtenstein, Esquire, is hereby designated as trial counsel in the above-captioned litigation on behalf of the firm of Cooper Levenson, P.A.

COOPER LEVENSON, P.A.

BY


RUSSELL L. LICHTENSTEIN

Attorneys for Defendant, Tropicana Atlantic City
Corp. d/b/a Tropicana Casino and Resort

DATED: August 27, 2018

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-002062-18

Case Caption: DYNAMIC DUO 8 LLC D/ B/A ANTHE VS KINSALE INSURA

Case Initiation Date: 08/21/2018

Attorney Name: RUSSELL L LICHTENSTEIN

Firm Name: COOPER LEVISON PA

Address: 1125 ATLANTIC AVE 3RD FL
ATLANTIC CITY NJ 08401

Phone:

Name of Party: DEFENDANT : TROPICANA ATLANTIC CITY CORP.

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)

Document Type: Answer

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

08/28/2018
Dated

/s/ RUSSELL L LICHTENSTEIN
Signed

JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989
GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL, P.C.
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344-7131/(609) 347-2052 fax
Attorneys for Plaintiffs

DYNAMIC DUO 8, LLC d/b/a ANTHEM) SUPERIOR COURT OF NEW JERSEY
LOUNGE & MAUREACE SNAPP,) LAW DIVISION
Plaintiffs,) ATLANTIC COUNTY
v.) DOCKET NO.: ATL-L-2062-18
KINSALE INSURANCE COMPANY,)
GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a TROPICANA) **AFFIDAVIT OF SERVICE**
CASINO & RESORT, JESUS PRADO,)
DAVID TSAPIS, JOHN DOES I-V, ABC)
BUSINESS ENTITIES I-V & XYZ)
CORPORATIONS I-V,)
Defendants.)

TO THE CLERK OF THE SUPERIOR COURT:

I, Joel M. Chipkin, being duly sworn, depose and say that on August 27, 2018 I served via certified mail, return receipt requested, a true and correct copy of the Summons, Complaint, Case Information Statement and Track Assignment Notice for Defendant Garrett Griffin on Keith Thomas West, Esquire, Law Offices of David Thiruselvam, 121 South Broad Street, 18th Floor, Philadelphia, Pennsylvania 19107. A copy of the certified green card is attached hereto as Exhibit A.

**GOLDENBERG MACKLER SAYEGH MINTZ PFEFFER
BONCHI & GILL
Attorneys for Plaintiffs**

By:

Joel M. Chipkin, Esquire

Dated: August 29, 2018

SENDER: COMPLETE THIS SECTION	
<ul style="list-style-type: none">■ Complete items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.	
COMPLETE THIS SECTION ON DELIVERY	
A. Signature	
	
B. Received by (Printed Name)	C. Date of Delivery
Stephen K. Thomas	8/27/18
D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If YES, enter delivery address below:	
Keith Thomas West, Esquire Law Offices of David Thiruselvam 121 S. Broad St., 18 th Fl-Cr Philadelphia, PA 19107	
3. Service Type	
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail	
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise	
<input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
2. Article Number <i>(Transfer from service label)</i>	7012 2210 0002 5795 9802
PS Form 3811, February 2004	
Domestic Return Receipt	
102559-02-M-1540	

EXHIBIT

A

JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989
GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL, P.C.
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344-7131/(609) 347-2052 fax
Attorneys for Plaintiffs

)
DYNAMIC DUO 8, LLC d/b/a ANTHEM) SUPERIOR COURT OF NEW JERSEY
LOUNGE & MAUREACE SNAPP,) LAW DIVISION
Plaintiffs,) ATLANTIC COUNTY
) DOCKET NO.: ATL-L-2062-18
v.)
) Civil Action
KINSALE INSURANCE COMPANY,)
GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a TROPICANA) **AFFIDAVIT OF SERVICE**
CASINO & RESORT, JESUS PRADO,)
DAVID TSAPIS, JOHN DOES I-V, ABC)
BUSINESS ENTITIES I-V & XYZ)
CORPORATIONS I-V,)
Defendants.)
)

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I, Joel M. Chipkin, being duly sworn, depose and say that on August 23, 2018 I served via certified mail, return receipt requested, a true and correct copy of the Summons, Complaint, Case Information Statement and Track Assignment Notice for Defendant Tropicana Atlantic City Corp. d/b/a Tropicana Casino & Resort on Russell L. Lichtenstein, Cooper Levenson, 1125 Atlantic Avenue, 3rd Floor, Atlantic City, New Jersey. A copy of the certified green card is attached hereto as Exhibit A.

**GOLDENBERG MACKLER SAYEGH MINTZ PFEFFER
BONCHI & GILL
Attorneys for Plaintiffs**

By: _____

Joel M. Chipkin, Esquire

Dated: August 29, 2018

SENDER: COMPLETE THIS SECTION	
<p>COMPLETE THIS SECTION ON DELIVERY</p> <p>A. Signature <i>J. M.</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by <i>ATLIC</i> <input checked="" type="checkbox"/> Printed Name <input type="checkbox"/> C. Date of Delivery <i>AUG 23 2003</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p><i>AUG 23 2003</i></p>	
<p>1. Article Addressed to:</p> <p>Russell L. Lichtenstein, Esquire Cooper Levenson 1125 Atlantic Avenue, 3rd Floor Atlantic City, NJ 08401</p>	
<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
2. Article Number (Transfer from service label)	7012 2210 0002 5795 9819
PS Form 3811, February 2004	Domestic Return Receipt
102555-02-M-1540	



JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989

GOLDENBERG MACKLER SAYEGH MINTZ

PFEFFER BONCHI & GILL, P.C.

1030 Atlantic Avenue

Atlantic City, NJ 08401

(609) 344-7131/(609) 347-2052 fax

Attorneys for Plaintiffs

DYNAMIC DUO 8, LLC d/b/a ANTHEM LOUNGE & MAUREACE SNAPP,)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION
)	ATLANTIC COUNTY
Plaintiffs,)	
)	DOCKET NO.: ATL-L-2062-18
v.)	
)	Civil Action
KINSALE INSURANCE COMPANY,)	
GARRETT GRIFFIN, TROPICANA)	
ATLANTIC CITY CORP. d/b/a)	AFFIDAVIT OF DILIGENT INQUIRY
TROPICANA CASINO & RESORT,)	AS TO DEFENDANT GARRETT GRIFFIN
JESUS PRADO, DAVID TSAPIS, JOHN)	
DOES I-V, ABC BUSINESS ENTITIES I-)	
V & XYZ CORPORATIONS I-V,)	
)	
Defendants.)	
)	

Joel M. Chipkin hereby certifies the following factual information in accordance with

R. 1:4-4(b):

1. I am an attorney at law in the State of New Jersey, a member of the law firm of Goldenberg Mackler Sayegh Mintz Pfeffer Bonchi & Gill, attorneys for Plaintiffs Dynamic Duo 8, LLC d/b/a Anthem Lounge (“Anthem”) and Maureace Snapp (“Snapp”) and am charged with this litigation.

2. Anthem and Snapp are Defendants in the matter, *Garrett Griffin v. Tropicana Atlantic City Corp. d/b/a Tropicana Casino & Resort et al*, Docket No. CAM-L-1594-16. Plaintiff Garrett Griffin (“Griffin”) is being represented by Keith Thomas West, Esquire in that matter.

3. On August 21, 2018, I made inquiry to Mr. West if he would accept service on

behalf of Griffin in this matter docketed in Atlantic County. Mr. West agreed to accept service on behalf of Griffin.

4. Service of the Summons, Complaint, Case Information Statement and Track Assignment Notice was made on Mr. West on behalf of Griffin on August 27, 2018. (*See Affidavit Service attached hereto as Exhibit A*).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Joel M. Chipkin, Esquire

Dated: September 4, 2018

JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989
GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL, P.C.
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344-7131/(609) 347-2052 fax
Attorneys for Plaintiffs

)
DYNAMIC DUO 8, LLC d/b/a ANTHEM) SUPERIOR COURT OF NEW JERSEY
LOUNGE & MAUREACE SNAPP,) LAW DIVISION
Plaintiffs,) ATLANTIC COUNTY
) DOCKET NO.: ATL-L-2062-18
v.)
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KINSALE INSURANCE COMPANY,)
GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a TROPICANA) **AFFIDAVIT OF SERVICE**
CASINO & RESORT, JESUS PRADO,)
DAVID TSAPIS, JOHN DOES I-V, ABC)
BUSINESS ENTITIES I-V & XYZ)
CORPORATIONS I-V,)
Defendants.)
)

TO THE CLERK OF THE SUPERIOR COURT:

I, Joel M. Chipkin, being duly sworn, depose and say that on August 27, 2018 I served via certified mail, return receipt requested, a true and correct copy of the Summons, Complaint, Case Information Statement and Track Assignment Notice for Defendant Garrett Griffin on Keith Thomas West, Esquire, Law Offices of David Thiruselvam, 121 South Broad Street, 18th Floor, Philadelphia, Pennsylvania 19107. A copy of the certified green card is attached hereto as Exhibit A.

GOLDENBERG MACKLER SAYEGH MINTZ PFEFFER
BONCHI & GILL
Attorneys for Plaintiffs

By: _____

Joel M. Chipkin, Esquire

Dated: August 29, 2018



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■ Print your name and address on the reverse so that we can return the card to you.	
■ Attach this card to the back of the mailpiece, or on the front if space permits.	
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COMPLETE THIS SECTION ON DELIVERY	
A. Signature	
<input checked="" type="checkbox"/> X	
B. Received by (Printed Name)	C. Date of Delivery
Stephenie K. h.	8/27/08
D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If YES, enter delivery address below:	
102595-02-M-1540	
3. Service Type	
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail	
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise	
<input type="checkbox"/> Insured Mail <input checked="" type="checkbox"/> C.O.D.	
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PS Form 3811, February 2004 Domestic Return Receipt	



JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989

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PFEFFER BONCHI & GILL, P.C.

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Attorneys for Plaintiffs

DYNAMIC DUO 8, LLC d/b/a ANTHEM LOUNGE & MAUREACE SNAPP,)	SUPERIOR COURT OF NEW JERSEY
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Defendants.)	
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R. 1:4-4(b):

1. I am an attorney at law in the State of New Jersey, a member of the law firm of Goldenberg Mackler Sayegh Mintz Pfeffer Bonchi & Gill, attorneys for Plaintiffs Dynamic Duo 8, LLC d/b/a Anthem Lounge (“Anthem”) and Maureace Snapp (“Snapp”) and am charged with this litigation.

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3. On August 22, 2018, I made inquiry to Mr. Lichtenstein if he would accept service on behalf of Tropicana in this matter docketed in Atlantic County. Mr. Lichtenstein agreed to accept service on behalf of Tropicana.

4. Service of the Summons, Complaint, Case Information Statement and Track Assignment Notice was made on Mr. Lichtenstein on behalf of Tropicana on August 23, 2018. (See Affidavit Service attached hereto as Exhibit A).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Joel M. Chipkin, Esquire

Dated: September 4, 2018

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GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL, P.C.
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344-7131/(609) 347-2052 fax
Attorneys for Plaintiffs

)
DYNAMIC DUO 8, LLC d/b/a ANTHEM) SUPERIOR COURT OF NEW JERSEY
LOUNGE & MAUREACE SNAPP,) LAW DIVISION
Plaintiffs,) ATLANTIC COUNTY
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GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a TROPICANA) **AFFIDAVIT OF SERVICE**
CASINO & RESORT, JESUS PRADO,)
DAVID TSAPIS, JOHN DOES I-V, ABC)
BUSINESS ENTITIES I-V & XYZ)
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I, Joel M. Chipkin, being duly sworn, depose and say that on August 23, 2018 I served via certified mail, return receipt requested, a true and correct copy of the Summons, Complaint, Case Information Statement and Track Assignment Notice for Defendant Tropicana Atlantic City Corp. d/b/a Tropicana Casino & Resort on Russell L. Lichtenstein, Cooper Levenson, 1125 Atlantic Avenue, 3rd Floor, Atlantic City, New Jersey. A copy of the certified green card is attached hereto as Exhibit A.

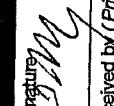
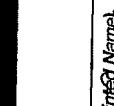
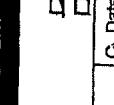
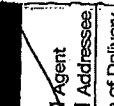
GOLDENBERG MACKLER SAYEGH MINTZ PFEFFER
BONCHI & GILL
Attorneys for Plaintiffs

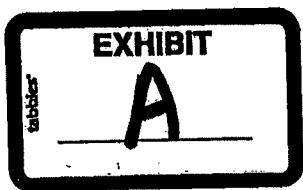
By: _____

Joel M. Chipkin, Esquire

Dated: August 29, 2018



COMPLETE THIS SECTION ON DELIVERY			
SENDER: COMPLETE THIS SECTION	<p>A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee:</p> <p>B. Received by (Printed Name)  <input type="checkbox"/> C. Date of Delivery  <input type="checkbox"/> D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below:  AUG 23 2013</p>		
1. Article Addressed to:	<p>Russell L. Lichtenstein, Esquire Cooper Levenson 1125 Atlantic Avenue, 3rd Floor Atlantic City, NJ 08401</p>		
2. Article Number (Transfer from service label)	<p>7012 2210 0002 5795 9819</p>		
PS Form 3811, February 2004	Domestic Return Receipt		
10255-02-M-1540			



JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989
GOLDENBERG MACKLER SAYEGH MINTZ
PFEFFER BONCHI & GILL, P.C.
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344-7131/(609) 347-2052 fax
Attorneys for Plaintiffs

DYNAMIC DUO 8, LLC d/b/a ANTHEM)
LOUNGE & MAUREACE SNAPP,)
Plaintiffs,)
v.)
KINSALE INSURANCE COMPANY,)
GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a)
TROPICANA CASINO & RESORT,)
JESUS PRADO, DAVID TSAPIS, JOHN)
DOES I-V, ABC BUSINESS ENTITIES I-)
V & XYZ CORPORATIONS I-V,)
Defendants.)
)
SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
ATLANTIC COUNTY
DOCKET NO.: ATL-L-2062-18
Civil Action
ACKNOWLEDGEMENT OF SERVICE

To: Russell L. Lichtenstein, Esquire
Cooper Levenson
1125 Atlantic Avenue, 3rd Floor
Atlantic City, NJ 08401

The undersigned hereby acknowledges service on behalf of Defendant Tropicana Atlantic City Corp. d/b/a Tropicana Casino & Resort of Plaintiffs Dynamic Duo 8, LLC and Maureace Snapp's Summons, Complaint, Case Information Statement and Track Assignment Notice on August 23, 2018.

Dated: 9/5/2018

Russell L. Lichtenstein

JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989

GOLDENBERG MACKLER SAYEGH MINTZ

PFEFFER BONCHI & GILL, P.C.

1030 Atlantic Avenue

Atlantic City, NJ 08401

(609) 344-7131/(609) 347-2052 fax

Attorneys for Plaintiffs

)
DYNAMIC DUO 8, LLC d/b/a ANTHEM) SUPERIOR COURT OF NEW JERSEY
LOUNGE & MAUREACE SNAPP,) LAW DIVISION
Plaintiffs,) ATLANTIC COUNTY
v.) DOCKET NO.: ATL-L-2062-18
KINSALE INSURANCE COMPANY,)
GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a) **ACKNOWLEDGEMENT OF SERVICE**
TROPICANA CASINO & RESORT,)
JESUS PRADO, DAVID TSAPIS, JOHN)
DOES I-V, ABC BUSINESS ENTITIES I-)
V & XYZ CORPORATIONS I-V,)
Defendants.)
)

To: Keith Thomas West, Esquire
Law Offices of David P. Thiruselvan, LLC
121 South Broad Street, 18th Floor
Philadelphia, PA 19107

The undersigned hereby acknowledges service on behalf of Defendant Garrett Griffin of
Plaintiffs Dynamic Duo 8, LLC and Maureace Snapp's Summons, Complaint, Case Information
Statement and Track Assignment Notice on August 27, 2018

Keith Thomas West

Dated: Sept. 5, 2018

LAW OFFICES OF DAVID P. THIRUSELVAM, LLC
BY: David P. Thiruselvam, Esquire
Keith Thomas West, Esquire
121 South Broad Street, 18th Floor
Philadelphia, Pennsylvania 19107
215-546-1433 - Telephone
215-644-8754 - Fax
keith@dptlawusa.com

Attorneys for Defendant, Garrett Griffin

DYNAMIC DUO 8, LLC, d/b/a/ d/b/a ANTHEM LOUNGE & MAUREACE SNAPP,	:	SUPERIOR COURT OF NEW JERSEY LAW DIVISION ATLANTIC COUNTY
	:	
Plaintiffs,	:	DOCKET NO. ATL-L-2062-18
	:	
vs.	:	Civil Action
	:	
KINSALE INSURANCE COMPANY, GARRETT GRIFFIN, TROPICANA ATLANTIC CITY CORP., d/b/a TROPICANA CASINO & RESORT, JESUS PRADO, DAVID TSAPSIS, JOHN DOES I-V & XYZ CORP.S I-V,	:	ANSWER TO PLAINTIFFS' COMPLAINT
	:	
	:	
Defendants.	:	

Defendant, Garrett Griffin, by and through his attorneys, by way of Answer to Plaintiffs' Complaint for Declaratory Judgment hereby says as follows:

FIRST COUNT

1. This answering party is without information sufficient to form a belief as to the truthfulness of this allegation of Plaintiffs' Complaint and leaves Plaintiffs to their proofs.
2. Admitted.
3. Denied as stated. By way of further response, Defendant, Garrett Griffin, did not institute suit against Jesus Prado or David Tsapsis. By way of further response, the pleadings in the underlying action are in writing and thus speak for themselves and no response is required.

4. Denied as stated. By way of further response, the Second Amended Complaint that was filed by Defendant, Garrett Griffin, in the underlying action is in writing and thus speaks for itself and no response is required.

5. This paragraph states conclusions of law to which no response is required.

6. This answering party is without information sufficient to form a belief as to the truthfulness of this allegation of Plaintiffs' Complaint and leaves Plaintiffs to their proofs.

7. This paragraph states conclusions of law to which no response is required.

8. This paragraph states conclusions of law to which no response is required.

NOTICE PURSUANT TO RULES 1:5-1(a) AND 4:17-4(c)

Take notice that the undersigned attorneys, counsel for the answering defendant, hereby demand, pursuant to *R. 1:5-1(a)* and *R. 4:17-4(c)* that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers, and other materials referred to therein, upon the undersigned attorneys, and take notice that this is a continuing demand.

JURY DEMAND

Trial by jury is hereby demanded as to all issues set forth herein.

CERTIFICATION

It is hereby certified that a copy of the within pleading was served upon Joel Chipkin, attorney for Plaintiffs, by eCourts electronic filing within the time prescribed by the Rules.

CERTIFICATION PURSUANT TO RULE 4:5-1

The undersigned counsel certifies on behalf of the answering defendant as follows:

1. I am an attorney admitted to practice law in the State of New Jersey, with The Law Offices of David P. Thiruselvam, LLC, counsel for the answering defendant.
2. The matter in controversy in this case not the subject of any other action pending in any court or a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.
3. At this time, there are no other parties who should be joined to this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

NOTICE OF TRIAL COUNSEL

Please be notified that pursuant to R. 4:25, David P. Thiruselvam, Esquire, is hereby designated as trial counsel in the above-captioned lawsuit on behalf of the firm The Law Offices of David P. Thiruselvam, LLC.

LAW OFFICES OF DAVID P. THIRUSELVAM, LLC

/s/ Keith Thomas West
KEITH THOMAS WEST, ESQUIRE
Attorney for Defendant, Garrett Griffin

Date: September 5, 2018

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-002062-18

Case Caption: DYNAMIC DUO 8 LLC D/ B/A ANTHE VS KINSALE INSURA

Case Initiation Date: 08/21/2018

Attorney Name: KEITH THOMAS WEST

Firm Name: DAVID P. THIRUSELVAM

Address: 121 SOUTH BROAD STERET 18TH FLOOR
PHILADELPHIA PA 19073

Phone:

Name of Party: DEFENDANT : GRIFFIN, GARRETT

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)

Document Type: Answer

Jury Demand: YES - 6 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

09/05/2018
Dated

/s/ KEITH THOMAS WEST
Signed

AFFIDAVIT OF SERVICE

State of New Jersey

County of Atlantic

Superior Court

Case Number: ATL L 2062 18

Plaintiff:

DYNAMIC DUO 8, LLC DBA ANTHEM LOUNGE, ET AL.

vs.

Defendant:

KINSALE INSURANCE CO., ET AL.

For:

JOEL CHIPKIN

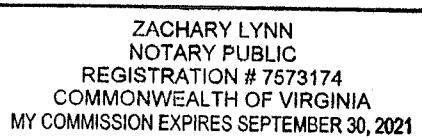
Received by Guaranteed Subpoena Service, Inc. to be served on **KINSALE INSURANCE CO., 2221 EDWARD HOLLAND DR, STE 600, RICHMOND, VA 23230**.

I, Peyton Eastwood, being duly sworn, depose and say that on the **23rd day of August, 2018 at 3:15 pm, I:**

Served SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT NOTICE, CERTIFICATION personally to Lauren Brown as Claims Manager of KINSALE INSURANCE CO.. Service occurred at 2221 EDWARD HOLLAND DR, STE 600, RICHMOND, VA 23230.

Description of Person Served: Age: 40, Sex: F, Race/Skin Color: White, Height: 5'10", Weight: 160, Hair: Light Brown, Glasses: N

I am a natural person over the age of eighteen and am not a party to or otherwise interested in the subject matter in controversy. I am a private process server authorized to serve this process in accordance with relevant law. Under penalty of perjury, I declare that the foregoing is true and correct.



Subscribed and sworn to in my state and county by
the affiant who is personally known to me.

NOTARY PUBLIC

Date: 8/27/18

Peyton Eastwood
Process Server

Guaranteed Subpoena Service, Inc.
2009 Morris Ave
Union, NJ 07083
(800) 672-1952

Our Job Serial Number: GTS-0000033997
Ref: 20180822125201



JOEL M. CHIPKIN, ESQUIRE- ATTORNEY ID: 027301989
GOLDENBERG, MACKLER, SAYEGH, MINTZ
PFEFFER, BONCHI & GILL
1030 Atlantic Avenue
Atlantic City, NJ 08401
(609) 344 7131/(609) 347 2052 fax
Attorneys for Plaintiffs

DYNAMIC DUO 8, LLC d/b/a ANTHEM LOUNGE & MAUREACE SNAPP,)	SUPERIOR COURT OF NEW JERSEY
)	LAW DIVISION
)	ATLANTIC COUNTY
Plaintiffs,)	
)	DOCKET NO. ATL-L-2062-18
v.)	
)	Civil Action
KINSALE INSURANCE COMPANY,)	
GARRETT GRIFFIN, TROPICANA)	
ATLANTIC CITY CORP d/b/a)	SUMMONS
TROPICANA CASINO & RESORT,)	
JESUS PRADO, DAVID TSAPIS, JOHN)	
DOES I-V, ABC BUSINESS ENTITIES I-)	
V & XYZ CORPORATIONS, I-V,)	
)	
Defendants.)	
)	

FROM THE STATE OF NEW JERSEY, TO THE DEFENDANT(S) NAMED ABOVE:

The Plaintiffs, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and Proof of Service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf). If the Complaint is one in foreclosure then you must file your written Answer or Motion and Proof of Service with the Clerk, Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton New Jersey 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to Plaintiffs' attorney, whose name and address appear above, or to Plaintiffs, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with a fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written Answer or Motion with 35 days, the Court may enter a judgment against you for the relief Plaintiffs' demand, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have any attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.juciciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

s/Michelle M. Smith _____

Michelle M. Smith
Clerk of the Superior Court

Dated: August 22, 2018

Name of Defendant to Be Served:
Address of Defendant to Be Served:

KINSALE INSURANCE COMPANY
2221 EDWARD HOLLAND DRIVE, SUITE 600
RICHMOND, VIRGINIA 23230

**DIRECTORY OF SUPERIOR COURT DEPUTY CLERKS' OFFICES
 COUNTY LAWYER REFERRAL AND LEGAL SERVICES OFFICES**

ATLANTIC COUNTY: Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bacharach Boulevard – 1 st Floor Atlantic City, NJ 08401	LAWYER REFERRAL (609) 345-3444 LEGAL SERVICES (609) 348-4200	MERCER COUNTY: Deputy Clerk of the Superior Court Local Filing Office, Courthouse P.O. Box 8068 Trenton, NJ 08650	LAWYER REFERRAL (609) 585-6200 LEGAL SERVICES (609) 695-6249
BERGEN COUNTY: Deputy Clerk of the Superior Court Civil Division, Room 115 Justice Center, 10 Main Street Hackensack, NJ 07601	LAWYER REFERRAL (201) 488-0044 LEGAL SERVICES (201) 487-2166	MIDDLESEX COUNTY: Deputy Clerk of the Superior Court 56 Paterson Street P.O. Box 2633 New Brunswick, NJ 08903-2633	LAWYER REFERRAL (732) 828-0053 LEGAL SERVICES (732) 249-7600
BURLINGTON COUNTY: Deputy Clerk of the Superior Court Central Processing Office Attn: Judicial Intake 49 Rancocas Road – 1 st Floor Mt. Holly, NJ 08060	LAWYER REFERRAL (609) 261-4862 LEGAL SERVICES (800) 496-4570	MONMOUTH COUNTY: Deputy Clerk of the Superior Court P.O. Box 1269 Freehold, NJ 07728-1269	LAWYER REFERRAL (732) 431-5544 LEGAL SERVICES (732) 866-0020
CAMDEN COUNTY: Deputy Clerk of the Superior Court Civil Processing Office Hall of Justice - 1 st Floor, Suite 150 101 South 5 th Street Camden, NJ 08103	LAWYER REFERRAL (856) 964-4520 LEGAL SERVICES (856) 964-2010	MORRIS COUNTY: Morris County Courthouse Civil Division P.O. Box 910 Morristown, NJ 07963-0910	LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 285-6911
CAPE MAY COUNTY: Deputy Clerk of the Superior Court 9 North Main Street Cape May Court House, NJ 08210	LAWYER REFERRAL (609) 463-0313 LEGAL SERVICES (609) 465-3001	OCEAN COUNTY: Deputy Clerk of the Superior Court 118 Washington Street Toms River, NJ 08754	LAWYER REFERRAL (732) 240-3666 LEGAL SERVICES (732) 341-2727
CUMBERLAND COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office P.O. Box 10 Bridgeton, NJ 08302	LAWYER REFERRAL (856) 692-6207 LEGAL SERVICES (856) 451-0003	PASSAIC COUNTY: Deputy Clerk of the Superior Court Civil Division 77 Hamilton Street Paterson, NJ 07505	LAWYER REFERRAL (973) 278-9223 LEGAL SERVICES (973) 523-2900
ESSEX COUNTY: Deputy Clerk of the Superior Court 465 Dr. Martin Luther King Jr. Blvd. Newark, NJ 07102	LAWYER REFERRAL (973) 622-6207 LEGAL SERVICES (973) 624-4500	SALEM COUNTY: Deputy Clerk of the Superior Court P.O. Box 29 Salem, NJ 08079	LAWYER REFERRAL (856) 678-8363 LEGAL SERVICES (856) 451-0003
GLOUCESTER COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Attn: Intake P.O. Box 750 Woodbury, NJ 08096	LAWYER REFERRAL (856) 848-4589 LEGAL SERVICES (856) 848-5360	SOMERSET COUNTY: Deputy Clerk of the Superior Court Civil Division 40 North Bridge Street P.O. Box 3000 Somerville, NJ 08875	LAWYER REFERRAL (908) 685-2323 LEGAL SERVICES (908) 231-0840
HUDSON COUNTY: Deputy Clerk of the Superior Court Brennan Court House – 1 st Floor 581 Newark Avenue Jersey City, NJ 07306	LAWYER REFERRAL (201) 798-2727 LEGAL SERVICES (201) 792-6363	SUSSEX COUNTY: Deputy Clerk of the Superior Court Sussex County Judicial Center 43-47 High Street Newton, NJ 07860	LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 383-7400
HUNTERDON COUNTY: Deputy Clerk of the Superior Court Civil Division 65 Park Avenue Flemington, NJ 08822	LAWYER REFERRAL (908) 735-2611 LEGAL SERVICES (908) 782-7979	UNION COUNTY: Deputy Clerk of the Superior Court 1 st Floor, Court House 2 Broad Street Elizabeth, NJ 07207-6073	LAWYER REFERRAL (908) 353-4715 LEGAL SERVICES (908) 354-4340
		WARREN COUNTY: Deputy Clerk of the Superior Court Civil Division Office Court House 413 Second Street Belvidere, NJ 07823-1500	LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (908) 475-2010

JOEL M. CHIPKIN, ESQUIRE - ATTORNEY ID: 027301989

GOLDENBERG MACKLER SAYEGH MINTZ

PFEFFER BONCHI & GILL, P.C.

1030 Atlantic Avenue

Atlantic City, NJ 08401

(609) 344-7131/(609) 347-2052 fax

Attorneys for Plaintiffs

)
DYNAMIC DUO 8, LLC d/b/a ANTHEM) SUPERIOR COURT OF NEW JERSEY
LOUNGE & MAUREACE SNAPP,) LAW DIVISION
Plaintiffs,) ATLANTIC COUNTY
) DOCKET NO.: ATL-L-2062-18
v.)
) Civil Action
KINSALE INSURANCE COMPANY,)
GARRETT GRIFFIN, TROPICANA)
ATLANTIC CITY CORP. d/b/a) **AFFIDAVIT OF DILIGENT INQUIRY**
TROPICANA CASINO & RESORT,)
JESUS PRADO, DAVID TSAPIS, JOHN)
DOES I-V, ABC BUSINESS ENTITIES I-)
V & XYZ CORPORATIONS I-V,)
Defendants.)
)

Joel M. Chipkin hereby certifies the following factual information in accordance with

R. 1:4-4(b):

1. I am an attorney at law in the State of New Jersey, a partner in the law firm of Goldenberg Mackler Sayegh Mintz Pfeffer Bonchi & Gill, attorneys for Plaintiffs Dynamic Duo 8, LLC and Maureace Snapp, and am charged with this personal injury litigation.

2. I have made inquiry with regard to the whereabouts of Defendant, Kinsale Insurance Company in order to serve said Defendant in the above captioned matter.

3. An internet search revealed that Defendant Kinsale Insurance Company's office was located in Richmond, Virginia.

4. I was satisfied and convinced that this Defendant could not be personally served in the State of New Jersey because there main office is in Richmond, Virginia.

5. Therefore, on August 23, 2018 Defendant Kinsale Insurance Company was served with Summons, Complaint, Case Information Statement and Track Assignment Notice by Guaranteed Subpoena Services. (*See Exhibit A*).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Joel M. Chipkin, Esquire

Dated: September 7, 2018

AFFIDAVIT OF SERVICE

State of New Jersey

County of Atlantic

Superior Court

Case Number: ATL L 2062 18

Plaintiff:

DYNAMIC DUO 8, LLC DBA ANTHEM LOUNGE, ET AL.

vs.

Defendant:

KINSALE INSURANCE CO., ET AL.

For:

JOEL CHIPKIN

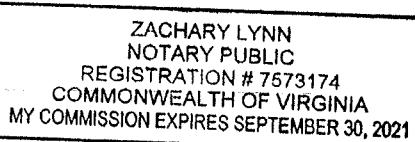
Received by Guaranteed Subpoena Service, Inc. to be served on **KINSALE INSURANCE CO., 2221 EDWARD HOLLAND DR, STE 600, RICHMOND, VA 23230**.

I, Peyton Eastwood, being duly sworn, depose and say that on the **23rd day of August, 2018 at 3:15 pm, I:**

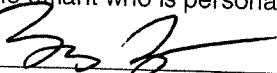
Served SUMMONS AND COMPLAINT, CIS, TRACK ASSIGNMENT NOTICE, CERTIFICATION personally to Lauren Brown as Claims Manager of KINSALE INSURANCE CO.. Service occurred at 2221 EDWARD HOLLAND DR, STE 600, RICHMOND, VA 23230.

Description of Person Served: Age: 40, Sex: F, Race/Skin Color: White, Height: 5'10", Weight: 160, Hair: Light Brown, Glasses: N

I am a natural person over the age of eighteen and am not a party to or otherwise interested in the subject matter in controversy. I am a private process server authorized to serve this process in accordance with relevant law. Under penalty of perjury, I declare that the foregoing is true and correct.

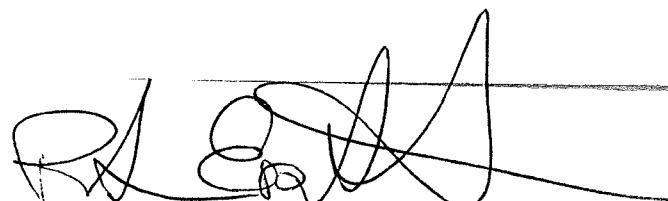


Subscribed and sworn to in my state and county by
the affiant who is personally known to me.



NOTARY PUBLIC

Date: 8/27/18



Peyton Eastwood
Process Server

Guaranteed Subpoena Service, Inc.
2009 Morris Ave
Union, NJ 07083
(800) 672-1952

Our Job Serial Number: GTS-0000033997
Ref: 20180822125201

